

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANGELICA JUNIOUS,)	
)	
Plaintiff,)	
)	
v.)	No. 2022 CV 3681
)	
SGT. W. BAKER #3159,)	
R/O C. CHENGARY #16269,)	
R/LT PURCELL #758,)	
OFFICER NEALON #18420,)	
OFFICER WALZ #18563,)	
OFFICER RAHN #17086,)	
OFFICER GLAZIERS,)	
COOK COUNTY SHERIFF TOM DART,)	
And COOK COUNTY, ILLINOIS,)	
)	
Defendants.)	

PLAINTIFF’S MOTION TO LIFT STAY

Plaintiff, Angelica Junious, respectfully moves to lift the stay on proceedings in this matter, including the discovery stay, because the criminal proceeding involving Steven McKinnie concluded on June 30, 2025, with a plea of guilty. In support of this motion, Plaintiff states as follows:

1. This case has effectively remained stayed since November 2023 (*see* DE 144, 145, 148, 150, 151, 153, 155, 159, 160, 161, 163, 164) and discovery was stayed since August 2023 (*see* DE 108) pending the resolution of the criminal case involving Steven McKinnie.
2. The related criminal case against McKinnie concluded June 30, 2025.
3. Plaintiff only recently learned of the conclusion of that matter and obtained a copy of the disposition. (*See Exhibit A.*)

4. The criminal proceedings are final, and no further direct criminal proceedings are possible since the 30 days to appeal have passed.

5. With the criminal case concluded, there is no longer any basis for maintaining a stay in this matter.

6. Plaintiff suffered significant harm as a result of the events described in the Complaint and has a right to pursue her claims without further delay.

7. Pursuant to Local Rule 37.2, Plaintiff's counsel did confer with Defense counsel prior to filing this motion. Counsel for Plaintiff contacted all counsel early last week by telephone. Counsel inquired as to whether any of the lawyers would oppose the motion. Thereafter, a follow up email communication with the motion attached was sent to all counsel of record with a similar inquiry. To date, counsel for Plaintiff has not received a communication opposing the motion.

WHEREFORE, Plaintiff respectfully requests that the stay, including the discovery stay, be lifted and that a status hearing be set to establish a short schedule to resolve this case. In advance of that hearing, the parties should be directed to file a status report listing any discovery that needs to be completed prior to trial.

Respectfully submitted,

PLAINTIFF ANGELICA JUNIOUS

By: /s/ Melvin L. Brooks
One of her Attorneys

Melvin L. Brooks
THE COCHRAN FIRM CHICAGO

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CERTIFICATE OF SERVICE

The undersigned certifies that on **September 2, 2025**, the foregoing **Motion to Lift Stay** was electronically filed with the Clerk of the United States District Court for the Northern District of Illinois by filing through the CM/ECF system, which served a copy of the foregoing upon all counsel of record.

/s/ Melvin L. Brooks